

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Civil Division

Case No. 19-cv-4616

(to be filled in by the Clerk's Office)

Detective Derrick Jacobs

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☒ Yes ☐ No

City of Philadelphia, Philadelphia District Attorney's Office, Lawrence S. Krasner, Tracy Tripp et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

FILED

NOV - 8 2019

KATE BARKMAN, Clerk
By _____ Dep. Clerk

AMENDED COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Detective Derrick Jacobs
Street Address	PO Box 56091
City and County	Philadelphia
State and Zip Code	PA 19130
Telephone Number	215-651-3583
E-mail Address	derrickjacobs9116@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name City of Philadelphia
 Job or Title *(if known)*
 Street Address 1515 Arch Street
 City and County Philadelphia
 State and Zip Code PA 19102
 Telephone Number 215-686-1776
 E-mail Address *(if known)*

Defendant No. 2

Name Philadelphia District Attorney's Office
 Job or Title *(if known)*
 Street Address 3 S Penn Square
 City and County Philadelphia
 State and Zip Code PA 19107
 Telephone Number 215-686-8000
 E-mail Address *(if known)*

Defendant No. 3

Name Lawrence S. Krasner (Individual)
 Job or Title *(if known)* District Attorney
 Street Address 3 S Penn Square
 City and County Philadelphia
 State and Zip Code PA 19107
 Telephone Number 215-686-8000
 E-mail Address *(if known)*

Defendant No. 4

Name Tracy Tripp (Individual)
 Job or Title *(if known)* Assistant District Attorney
 Street Address 3 S Penn Square
 City and County Philadelphia
 State and Zip Code PA 19107
 Telephone Number 215-686-8000
 E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Deprivation of Rights under the color of law 42 USC §1983

Malicious Prosecution 42 USC §1983

Conspiracy

Defamation 28 USC §4101, 42 §USC 1983

Discrimination

False declarations before grand jury or court 18 USC §1623, 42 USC

Whistleblower Law 43 PS 1421

Official Oppression 18 PA C.S. 5301

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of

the State of *(name)* _____ . Or is a citizen of
(foreign nation) _____ .

b. If the defendant is a corporation

The defendant, *(name)* _____ , is incorporated under
the laws of the State of *(name)* _____ , and has its
principal place of business in the State of *(name)* _____ .
Or is incorporated under the laws of *(foreign nation)* _____ ,
and has its principal place of business in *(name)* _____ .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy--the amount the plaintiff claims the defendant owes or the amount at stake--is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The District Attorney (Lawrence Krasner) conspired with Assistant District Attorney (Tracy Tripp) and other parties to deprive Detective Derrick Jacobs of his Constitution Rights by maliciously prosecuting him for a crime they knew he did not commit.

On Thursday, June 8, 2017 I, Detective Derrick Jacobs, was involved in an investigation involving a police shooting in the area of Whitaker and Hunting Park Avenue, involving Police Officer Ryan Pownall.

I, Detective Derrick Jacobs, became an integral part of the investigation due my involvement in interviewing the majority of "fact" witnesses with integrity and honesty, which did not conform to the District Attorney's Office political agenda. This caused the District Attorney's Office to surgically remove me from the investigation of Police Officer Ryan Pownall.

On November 9, 2018 criminal proceedings were brought against Detective Derrick Jacobs.

The defendants prosecuted Detective Derrick Jacobs (complainant) in an effort to stop, deter and eliminate the Detective from exposing exculpatory evidence in the prosecution of Police Officer Ryan Pownall.

After reviewing the grand jury presentment of Police Officer Ryan Pownall, Detective Jacobs deduced, based upon twenty years of experience and the factual knowledge he possessed on the investigation, that only false, misleading or perjured testimony was presented to the grand jury in order to obtain an indictment against Police Officer Ryan Pownall. When Detective Jacobs attempted to expose this corruption, criminal proceedings was initiated against Detective Derrick Jacobs by Assistant District Attorney, Tracy Tripp and the Philadelphia District Attorney's Office.

On Thursday, August 2, 2018, Assistant District Attorney Tracy Tripp contacted Detective Jacobs by telephone (OISI Headquarters) to go over his potential grand jury testimony. During conversation Detective Jacobs relayed his concerns regarding the prosecution of Police Officer Ryan Pownall. Detective Jacobs also informed Assistant District Attorney, Tracy Tripp that Attorney General Christopher Phillips told Detective Jacobs no charges would be brought against Officer Pownall after their meeting with witness, Terrance Freeman on Friday, November 3, 2017. Detective Jacobs asked if Terrance Freeman had testified and Assistant District Attorney, Tracy Tripp responded, "you know I can't tell you that". Detective Jacobs asked Assistant District Attorney, Tracy Tripp to contact Attorney General Christopher Phillips and the investigator that was present during meeting with Terrance Freeman. Assistant District Attorney, Tracy Tripp never involved Detective Derrick Jacobs in investigation after this phone call other than to maliciously prosecute him and deprive him of his Constitutional Rights while acting under the color of law.

The Philadelphia District Attorney's Office conspired with members of Black Lives Matter to intimidate and influence witness, Terrance Freeman's testimony. The prosecution of Detective Jacobs was also initiated because he is the only African American in the Officer Involved Shooting Investigation (OISI) Unit and his race presented a problem in the prosecution of Officer Ryan Pownall.

The criminal prosecution against Detective Derrick Jacobs was withdrawn after Assistant District Attorney, Tracy Tripp, believed Detective Jacobs silence was ensured until after the trial of Police Officer Ryan Pownall. Assistant District Attorney, Tracy Tripp, stated to a party that Judge Coleman would conduct a "fake admonishment" of Detective Jacobs to scare him from speaking until after the trial of Police Officer Ryan Pownall.

This corrupt and criminal prosecution of Detective Derrick Jacobs has caused irreparable damage to his Law Enforcement and personal reputation.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. This incident and subsequent court filings has caused irreparable and incomprehensible harm to Detective Jacobs Philadelphia Police Department's Law enforcement career.
2. Detective Jacobs seeks five million dollars (\$ 5,000.000.00) in total damages.
3. Two million dollars (2,000.000.00) in compensation damages (10 years at 200,000.00 a year).
4. Three million dollars (3,000,000.00) in punitive damages.
5. Ten years in equivalent LEHB medical coverage.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

11/08/2019

Signature of Plaintiff

Printed Name of Plaintiff

Detective Derrick Jacobs

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Pro Se 1 (Rev 12/16) Complaint for a Civil Case

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address